

EXHIBIT 4

PR#67234

GOAD, JOHN

4/19/2011

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

D.G. by Next Friend G. Gail
Stricklin, et al., for
themselves and those similarly
situated,

Plaintiff, Class Action
vs. Civil Action No.
08-CV-074-GKF-FHM

C. BRAD HENRY, in his official
capacity as Governor of the
State of Oklahoma, et al.,

Defendant.

JOHN GOAD, VOLUME I

April 19, 2011

The videotaped deposition of JOHN GOAD, taken
before Maria S. Winn, CSR, RPR and CRR, pursuant
to the Federal Rules of Civil Procedure for the
United States District Courts pertaining to the
taking of depositions, at the Hilton Orrington,
1710 Orrington Avenue, Evanston, Illinois,
commencing at 9:04 a.m. on April 19, 2011.

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1 did you tell her who your client was or who you
2 were consulting for?

3 A Yes.

4 Q Did you tell her Children's Rights?

5 A Yes.

6 Q Did you tell her that the job or the
7 potential job involved a lawsuit?

8 A Yes.

9 Q Did you show her any pleadings from the
10 lawsuit?

11 A I don't believe I did.

12 Q Did you show her your 2009 report, which
13 was Exhibit 1?

14 A I don't think I did. I remember thinking
15 about doing it, because I thought it would be
16 useful for her to look at the procedure portion of
17 it, but I think I opted not to, because I actually
18 didn't want her to read the conclusions.

19 Q Now, there was an Inter-Rater Review test
20 done here. Describe in general terms how that was
21 done, and then we may talk about it in more
22 particulars.

23 A There were a number of cases that were
24 randomly selected -- here we go with that random
25 selection stuff again.

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1 That were randomly selected from the
2 samples that had already been selected in each of
3 the four categories, and they were reviewed both
4 by Adele Prass and by me. And then Richard
5 Thompson compared the results of our findings in
6 those cases to determine whether or not, if asked
7 the same question, we would come up with the same
8 answer.

9 Q So did Dr. Thompson select from the
10 samples, a smaller sample?

11 A Correct.

12 Q By some statistical method?

13 A Some magical way.

14 Q Some magical way, okay.

15 And then did you and Ms. Prass use the
16 Appendix B document and independently, separately
17 review those that were chosen?

18 A Yes.

19 Q And then Dr. Thompson took the data that
20 was entered in the system and did some statistical
21 thing that shows up in, I think, Appendix A?

22 A Yes, he compared the results and came up
23 with Kappa scores.

24 Q What's a Kappa score?

25 A I can give you a somewhat crude